

Message

From: Geraldine Camilli [Geraldine Camilli <gcamilli@horsleywitten.com>]
Sent: 7/20/2012 2:57:15 PM
To: Jenny Thomas/DC/USEPA/US@EPA; Rachel Fertik/DC/USEPA/US@EPA; achel Fertik/DC/USEPA/US@EPA
CC: Craig Pereira [cpereira@horsleywitten.com]; homas Noble [tnoble@horsleywitten.com]
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment
Attachments: mime.htm; 1741.1.pdf; 1741.2.pdf; 1805.pdf; 1811.pdf; www.horsleywitten.com; Thomas.Jenny@epa.gov; gcamilli@horsleywitten.com; gcamilli@horsleywitten.com; cpereira@horsleywitten.com; tnoble@horsleywitten.com; www.horsleywitten.com; mailto:Thomas.Jenny@epamail.epa.gov; fertik.rachel@epa.gov; Thomas.Jenny@epa.gov; gcamilli@horsleywitten.com; gcamilli@horsleywitten.com; cpereira@horsleywitten.com; tnoble@horsleywitten.com; www.horsleywitten.com; mailto:Thomas.Jenny@epamail.epa.gov; Thomas.Jenny@epa.gov; gcamilli@horsleywitten.com; cpereira@horsleywitten.com; tnoble@horsleywitten.com; www.horsleywitten.com; mailto:Thomas.Jenny@epamail.epa.gov; Thomas.Jenny@epa.gov; gcamilli@horsleywitten.com; cpereira@horsleywitten.com; tnoble@horsleywitten.com; www.horsleywitten.com; mailto:Thomas.Jenny@epamail.epa.gov; Thomas.Jenny@epa.gov; gcamilli@horsleywitten.com; tnoble@horsleywitten.com; cpereira@horsleywitten.com; www.horsleywitten.com; Thomas.Jenny@epamail.epa.gov; mailto:Thomas.Jenny@epamail.epa.gov; Schultz.Eric@epamail.epa.gov; Frithsen.Jeff@epamail.epa.gov; Carothers.Lee@epamail.epa.gov; Semeniuk.Michael@epamail.epa.gov; Hough.Palmer@epamail.epa.gov; Fertik.Rachel@epamail.epa.gov; Schofield.Kate@epamail.epa.gov; Itkin.Cheryl@epamail.epa.gov; Thomas.Jenny@epa.gov

Hi Jenny and Rachel:

You were correct, there was not much content in the letters, despite them coming from non-general public commenters. A number of them came from NGOs requesting that the docket not be extended, and have very similar contents. In the group, a handful of letters may be of interest to you due to their discussion topic (see attached PDFs):

- 1741: Comment letter from the Wild Salmon Center, with one of their studies (in partnership with Trout Unlimited) as attachment: Bristol Bay's Wild Salmon Ecosystems and the Pebble Mine: Key Considerations for a Large-Scale Mine Proposal
- 1805: Comment letter raises concern with one of the peer reviewers.
- 1811: Comment letter provides summary statistics for all the public hearings after the main body of the comment.

I did not feel that these were necessarily worth posting to the ftp site, but please let me know if you would like them available.

Below is a quick update as of this morning:

- There are approximately 2,250 comments posted to the docket,
- A few new mass mailing campaigns have been posted, including from the following sponsoring organizations: NRDC, the National Parks Conservation Association, and the Sierra Club. There are now a total of 11 campaigns.
- Approximately 156 letters appear to have been "sponsored" by the Pebble Partnership, of which all are from Alaska, but outside the Bristol Bay Watershed.

· Below is an updated table of comment numbers by commenter category for the substantive comments – we are still catching up on total counts for modified mass mailers and private citizen general.

Commenter Category	# of Comments
Federal Government Agency	1
State Government Agency/Elected Official	9
Local Government Agency/Elected Official	10
Congressional Delegate	0
Industry - Mineral Extraction	9
Industry - Commercial Fisheries	49
Industry - Tourism	1
Industry - Other	27
National Environmental NGO	2
Other NGO	12
Academia/Professional Society	0
Private Citizen - Expert	10

Thank you,

Geraldine

Geraldine Camilli

Civil and Environmental Engineer

Horsley Witten Group

90 Route 6A, Sandwich, MA 02563

508-833-6600

www.horsleywitten.com

From: Jenny Thomas [mailto:Thomas.Jenny@epamail.epa.gov]
Sent: Wednesday, July 18, 2012 11:33 PM
To: Geraldine Camilli
Cc: Craig Pereira; Rachel Fertik; Thomas Noble
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Thanks Geraldine! I couldn't leave without checking out the docket so I did a quick scan. I believe most of the new comments from "organizations" are related to requests for extensions. These letters were originally sent directly to EPA and I forwarded them along to the docket a few weeks ago. I can't say for certain, but wanted to let you know!

Jenny

Jenny Thomas
Office of Wetlands, Oceans, and Watersheds
US Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460
Thomas.Jenny@epa.gov
T 202-564-4524

-----Geraldine Camilli <gcamilli@horsleywitten.com> wrote: -----

To: Jenny Thomas/DC/USEPA/US@EPA, Rachel Fertik/DC/USEPA/US@EPA
From: Geraldine Camilli <gcamilli@horsleywitten.com>
Date: 07/18/2012 10:21PM
Cc: Craig Pereira <cpereira@horsleywitten.com>, Thomas Noble <tnoble@horsleywitten.com>
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Hi Jenny,

Thank you for the heads up. Not a problem, we will.

Have a great weekend,

Geraldine

Geraldine Camilli

Civil and Environmental Engineer

Horsley Witten Group

90 Route 6A, Sandwich, MA 02563

508-833-6600

www.horsleywitten.com

From: Jenny Thomas [mailto:Thomas.Jenny@epamail.epa.gov]
Sent: Wednesday, July 18, 2012 9:51 PM
To: Geraldine Camilli; Rachel Fertik
Cc: Craig Pereira; Thomas Noble
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Thanks Geraldine. I'll be out of the office through Monday, so during that time can you please also include Rachel Fertik on your emails? (fertik.rachel@epa.gov)

Thanks!

Jenny Thomas
Office of Wetlands, Oceans, and Watersheds
US Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460
Thomas.Jenny@epa.gov
T 202-564-4524

-----Geraldine Camilli <gcamilli@horsleywitten.com> wrote: -----

To: Jenny Thomas/DC/USEPA/US@EPA
From: Geraldine Camilli <gcamilli@horsleywitten.com>
Date: 07/18/2012 05:43PM
Cc: Craig Pereira <cpereira@horsleywitten.com>, Thomas Noble <tnoble@horsleywitten.com>
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Hi Jenny:

I will have another update for you tomorrow morning, because it seems like a handful of potentially interesting comments were posted later this afternoon (docket is now at 1923 public comments). We will download them first thing, sort, and let you know, but there are a few that look like they are from relevant entities.

Best Regards

Geraldine

Geraldine Camilli

Civil and Environmental Engineer

Horsley Witten Group

90 Route 6A, Sandwich, MA 02563

508-833-6600

www.horsleywitten.com

From: Jenny Thomas [mailto:Thomas.Jenny@epamail.epa.gov]
Sent: Wednesday, July 18, 2012 4:59 PM
To: Geraldine Camilli
Cc: Craig Pereira; Thomas Noble
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Hi Geraldine, Thanks for the update.

Do you know if the letters "sponsored by Pebble" tend to be coming from citizens in Alaska? We're trying to figure out how this campaign from Pebble may skew our results.

Thanks,

Jenny

Jenny Thomas
Office of Wetlands, Oceans, and Watersheds
US Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460
Thomas.Jenny@epa.gov

From: Geraldine Camilli <gcamilli@horsleywitten.com>
To: Jenny Thomas/DC/USEPA/US@EPA
Cc: Craig Pereira <cpereira@horsleywitten.com>, Thomas Noble <tnoble@horsleywitten.com>
Date: 07/18/2012 04:40 PM
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Hi Jenny:

I like your plan. I had assumed numbers would change because some of the comments in that folder have numbers that have already been used by posted comments (e.g., 1630 when there are over 1700 comments on the docket). This is why I had expressed concern on our end. We can definitely take a look in that folder if we have a lull of work while we are waiting for comments to post.

As a quick update, we identified approximately 135 general public comments that appear to have been "sponsored" by the Pebble Partnership. Regarding other comments, not much of substance so far, but here is the breakdown of commenter categories.

Commenter Category	# of Comments
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Federal Government Agency	1
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State Government Agency/Elected Official	5
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Local Government Agency/Elected Official	10
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Congressional Delegate	0
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Industry - Mineral Extraction	9
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Industry - Commercial Fisheries	46
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Industry - Tourism	1
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Industry - Other	23
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National Environmental NGO	0
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Other NGO	7
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Academia/Professional Society	
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0

Private Citizen - Expert

8

Private Citizen - Environmental Justice Community

0

Private Citizen - General

695

Modified Mass Mailer

920

The Federal Agency is a hand-written letter from the National Park Service about a minor error in Chapter 7.

We look forward to "getting started with the 'real' comments" on this docket J

Best Regards,
Geraldine

Geraldine Camilli
Civil and Environmental Engineer
Horsley Witten Group
90 Route 6A, Sandwich, MA 02563
508-833-6600
www.horsleywitten.com

From: Jenny Thomas [mailto:Thomas.Jenny@epamail.epa.gov]
Sent: Wednesday, July 18, 2012 2:31 PM
To: Geraldine Camilli
Cc: Craig Pereira; Thomas Noble
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Thanks Geraldine --

I've been trying to find the ready to post folder on FDMS but it seems to have disappeared. I can't tell if the last 4 digits of the comment # stay the same as a document moves from there into the posted folder. If it can change.....that would be a huge hassle to have you download those comments and switch things later.

For now, let's just plan on having you all entering comments the docket has posted, and if you somehow get ahead of the docket we can look into other folders to download from.

After the 23rd (or whenever we start seeing substantive comments) I'll plan on sharing with you the table of comments we are tracking. I imagine we'll have a bit of a head start on you as we will pull things from the draft folder. This way, you can stay on the same page as us and if you all identify additional comments while reading through the docket we will make sure those also get passed along to our reviewers.

Jenny

Jenny Thomas

Office of Wetlands, Oceans, and Watersheds
US Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460
Thomas.Jenny@epa.gov
T 202-564-4524

From: Geraldine Camilli <gcamilli@horsleywitten.com>
To: Jenny Thomas/DC/USEPA/US@EPA
Cc: Craig Pereira <cpereira@horsleywitten.com>, Thomas Noble <tnoble@horsleywitten.com>
Date: 07/18/2012 02:11 PM
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Hi Jenny:

We can definitely look into the "ready to post" folder to get a sense of what is coming, but from our standpoint, we will still need to change the document number on anything we do with these comments. From a tracking and quality control standpoint, I am a little weary of introducing two numbering systems into our process, but will take a look at what we can do.

We will need to track the comments that we post to our ftp site so we will be developing our own table, but if you share your table with us regularly, we can make sure we are on the same page, and both teams are looking at the same comments.

Thank you for Erin and Eivy's access, they have been using it already.

Best Regards
Geraldine

Geraldine Camilli
Civil and Environmental Engineer
Horsley Witten Group
90 Route 6A, Sandwich, MA 02563
508-833-6600
www.horsleywitten.com

From: Jenny Thomas [mailto:Thomas.Jenny@epamail.epa.gov]
Sent: Wednesday, July 18, 2012 12:18 PM
To: Geraldine Camilli
Cc: Craig Pereira; Thomas Noble
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Hi Geraldine,

I don't think we want to spend too much time analyzing the comments in draft form because the comment # assigned to those comments can change as they move through the docket process. I think we'll have to rely on the docket center to pull the comments

we need to see from this section first. I've also used this draft folder as a place to scan for comments with several attachments.

However, comments in "ready to post" folder are a good preview of what the docket plans to post that day. If it proves useful, that might be a folder that you could use to get ahead of what the docket has officially posted to regs.gov.

Regarding the table of meaty comments, I think that we (WD) might access those first as we will pull from the draft folder when notified by the Docket Center. I will have to maintain a table to what we are tracking as we farm it out to people and can share that with you. This table will include the comments we plan to provide the peer review panel. I think it may be best for me to regularly share that table with you so that if you identify additional comments that we should be considering you can pass them along.

Thoughts?

J

P.S. Erin and Eivy should now have access to the docket.

Jenny Thomas
Office of Wetlands, Oceans, and Watersheds
US Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460
Thomas.Jenny@epa.gov
T 202-564-4524

From: Geraldine Camilli <gcamilli@horsleywitten.com>
To: Jenny Thomas/DC/USEPA/US@EPA
Cc: Thomas Noble <tnoble@horsleywitten.com>, Craig Pereira <cpereira@horsleywitten.com>
Date: 07/17/2012 05:03 PM
Subject: RE: Coordination with Docket Center-Bristol Bay Assessment

Hi Jenny:

I did not realize that comments are available in "draft" form on the docket until this morning, so this conference call was definitely helpful. I cannot seem to access them through my account at fdms.gov, but my colleague's account shows them. Since we did not know of their existence, we had not been going through the draft folder to find them, and were typically only downloading the "final" comments. Do you need us to go into the "draft" folder, or should we continue tracking "final" comments to avoid confusions on document numbers?

I have set up an internal process here to expedite our review of what is posted by the docket in their final comments, and for us to provide you with an FTP repository of all meaty PDFs, as well as a running table with key information (number, commenter, category). We had been typically checking the docket twice a day, but can start checking it more frequently for anything new. If something of substance appears, we can update the running table and the FTP site as the comments come in, and email you an updated running table if you think that would be helpful.

Please let me know how we can best assist you get through your time crunch.

Thank you
Geraldine

Geraldine Camilli
Civil and Environmental Engineer
Horsley Witten Group
90 Route 6A, Sandwich, MA 02563
508-833-6600
www.horsleywitten.com

From: Thomas.Jenny@epamail.epa.gov [mailto:Thomas.Jenny@epamail.epa.gov]
Sent: Tuesday, July 17, 2012 4:33 PM
To: Schultz.Eric@epamail.epa.gov; Geraldine Camilli; Frithsen.Jeff@epamail.epa.gov; Carothers.Lee@epamail.epa.gov; Semeniuk.Michael@epamail.epa.gov; Hough.Palmer@epamail.epa.gov; Fertik.Rachel@epamail.epa.gov
Cc: Craig Pereira; Schofield.Kate@epamail.epa.gov; Thomas Noble; Itkin.Cheryl@epamail.epa.gov
Subject: Coordination with Docket Center-Bristol Bay Assessment

All-

Thank you very much for meeting with us today to discuss the public comment process. I think I can speak for all of us in saying it was very helpful and allowed us to better understand the docket center process.

Just to confirm that we all have the same understanding of how things will work as we near the end of the comment period, I have typed up my notes. Please let me know if you have any questions or believe I captured something incorrectly.

As comments are received --

1. The docket center will review email comments for documents with large attachments.
- 2.
2. Comments with large attachments will be uploaded into FDMS in draft format.

Michael will email Jenny the draft comment # and comment author of these large comments.

- 3.
3. The Docket Center will continue processing comments submitted via Reg.gov as well as paper comments.

As the docket center identifies and loads significant comments, Michael will email Jenny with the draft comment # and comment author.

If significant paper comments are received (that are not also received electronically) the docket center will notify Jenny.

- 4.
4. Horsley-Witten (OW contractor) will be continually downloading comments from FDMS to prepare a high-level summary of public comments by COB July 30.
- 5.
5. As significant comments are received, Jenny will share comments with Jeff and will maintain a tracking spreadsheet.
- 6.
6. Jeff will assign comments to reviewers, requesting summaries by COB July 30.
- 7.

Thank you again, we look forward to working with you as the docket moves forward!

Jenny

Jenny Thomas
Office of Wetlands, Oceans, and Watersheds
US Environmental Protection Agency

1200 Pennsylvania Ave NW
Washington, DC 20460
Thomas.Jenny@epa.gov
T 202-564-4524